

Exhibit 4

MARGARET A. FISCHER
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<p>1 UNITED STATES DISTRICT COURT 2 EASTERN DISTRICT OF NEW YORK -----X 3 KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER, LOUIS PIA, THOMAS 4 BARDEN, CONSTANCE MANGAN, and CHARISE JONES, individually and on behalf 5 of all others similarly situated, 6 Plaintiffs, 7 Case No.: 2:23 Civ. 2848 8 (GRB) (ARL) -against- 9 GOVERNMENT EMPLOYEES INSURANCE 10 COMPANY D/B/A GEICO, 11 Defendants. -----X 12 13 DEPOSITION of MARGARET A. FISCHER 14 15 December 19, 2024 16 17 New York, New York 18 19 20 21 22 Reported By: 23 Marina Dubson 24 Job #: J12144278 25</p>	<p>1 APPEARANCES: 2 3 OUTTEN & GOLDEN, LLP Attorney for Plaintiffs 4 685 Third Avenue, 25th Floor, New York, New York 10017 5 (212) 245-1000 BY: SABINE JEAN, ESQ. 6 Sjean@outtengolden.com 7 ZARKA DSOUZA, ESQ. Zdesouza@outtengolden.com 8 9 10 DUANE MORRIS, LLP Attorney for Defendant 11 1540 Broadway, 14th Floor, New York, New York 10036 12 (212)471-1856 BY: GREG TSONIS, ESQ. 13 Gtsonis@duanemorris.com 14 15 16 Gil Peretz, Shereck Video, videographer, 17 18 19 20 21 22 23 24 25</p>
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<p>1 2 DATE: December 19, 2024 3 TIME: 10:00 a.m. 4 5 6 DEPOSITION of MARGARET A. FISCHER, an 7 opt-in Plaintiff herein, taken by the 8 Defendant, pursuant to Federal Rules of 9 Civil Procedure, and Notice, held at the 10 Duane Morris LLP, 1540 Broadway, 14th 11 Floor, New York, New York 10036, at the 12 above-mentioned date and time, before 13 MARINA DUBSON, a Notary Public of the State 14 of New York. 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 IT IS HEREBY STIPULATED AND AGREED, 2 by and between the attorneys for the 3 respective parties, as follows: 4 5 THAT all objections, except as to the form 6 of the questions, shall be reserved to the 7 time of the trial; 8 9 THAT the within examination may be signed 10 and sworn to before any Notary Public with 11 the same force and effect as if signed and 12 sworn to before the Court; 13 14 THAT filing of the original transcript of 15 the examination is waived. 16 17 18 19 20 21 22 23 24 25</p>

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1 M. A. Fischer
2 your phone looking for?
3 A. Anything relative to overtime.
4 Q. And, I guess, is that the
5 criteria that you were using as far as
6 something that you might need to provide if
7 it was relevant or relative to overtime?
8 MS. DSOUZA: Objection.
9 A. Yes.
10 BY MR. TSONIS:
11 Q. Okay. Besides your phone and
12 your, you know, physical files in your
13 home, any other places that you searched?
14 A. No.
15 Q. Did you find any documents that
16 you provided to counsel?
17 A. No.
18 Q. Did you ever have, I guess,
19 paper files in your home?
20 A. No.
21 Q. All right. Now, we haven't
22 gotten to your specific jobs you held at
23 Geico, but you worked in SIU, right?
24 A. Yes.
25 Q. And you said you worked in the

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1 M. A. Fischer
2 office, correct?
3 A. Yes.
4 Q. With the exception of a period
5 of time post COVID where employees worked
6 from home?
7 A. Yes.
8 Q. Okay. When you transitioned
9 back from working home to the office, were
10 you five days a week in the office?
11 A. I did not return to the office.
12 I retired.
13 Q. You retired.
14 And you never actually went
15 back to the office at that point?
16 A. Correct.
17 Q. Understood. Prior to that
18 point -- well, strike that.
19 What was your job title at
20 Geico before you retired?
21 A. Inside medical investigator.
22 Q. Okay. Did that job title
23 change at some point? Were you something
24 else, and you became an inside medical
25 investigator?

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1 M. A. Fischer
2 A. It was a -- I believe the
3 titles did change. It was just medical
4 investigator.
5 Q. Were you ever something known
6 as, like, a major case investigator?
7 A. Well, that's the same thing.
8 It was always a major case investigator.
9 Q. Okay. It was major case
10 because all the medical investigations
11 qualify as major case investigations; is
12 that right?
13 MS. DSOUZA: Objection.
14 A. No.
15 BY MR. TSONIS:
16 Q. Back up for a second.
17 What's the difference, I guess,
18 between a field or desk investigator and a
19 medical -- inside medical investigator?
20 A. I can answer what I did. I
21 can't tell you what other people's jobs
22 included. But my job, I investigated
23 medical providers and facilities.
24 Q. Were there others that would
25 qualify as major case but didn't have the

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1 M. A. Fischer
2 specific job title of -- strike that. I
3 misspoke.
4 Is it fair to characterize
5 major case as a sort of subgroup within
6 SIU?
7 A. Rephrase that.
8 Q. I'll ask a general question.
9 How -- what was the
10 organizational structure of the Melville or
11 Woodbury SIU office?
12 A. It was -- when I left, there
13 were two -- it was divided into two
14 managements. It was medical team -- there
15 was medical and there was other.
16 There were outside
17 investigators. There were inside
18 investigators. People did social media
19 searches. People did small investigations,
20 nothing -- and then we had medical
21 investigations, major medical
22 investigations.
23 Q. Were there other major
24 investigations that weren't medical?
25 A. I'm not--

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<p>1 M. A. Fischer</p> <p>2 Q. So, for example, investigation</p> <p>3 of a body shop that's facilitating</p> <p>4 fraudulent claims?</p> <p>5 A. Right. Yes.</p> <p>6 Q. All right. So, is it fair to</p> <p>7 characterize the inside and outside</p> <p>8 investigators that you referenced as</p> <p>9 generally investigating individual claims?</p> <p>10 MS. DSOUZA: Objection.</p> <p>11 A. I'm sorry. Repeat that.</p> <p>12 BY MR. TSONIS:</p> <p>13 Q. Yeah. Do inside or outside</p> <p>14 investigators, to your understanding,</p> <p>15 investigate typically, like, a single</p> <p>16 claim?</p> <p>17 A. Yes, some do.</p> <p>18 Q. All right. And as a major case</p> <p>19 investigator or inside medical</p> <p>20 investigator, was it your understanding</p> <p>21 that you were doing investigations at the</p> <p>22 entity level as opposed to the individual</p> <p>23 claim level?</p> <p>24 A. Yes.</p> <p>25 Q. You were investigating, in your</p>	<p>1 M. A. Fischer</p> <p>2 A. Bill Newport.</p> <p>3 Q. And when did Bill Newport start</p> <p>4 being your manager?</p> <p>5 A. I don't remember.</p> <p>6 Q. Did he get to the Woodbury or</p> <p>7 Melville office at around the same time as</p> <p>8 Courtney?</p> <p>9 A. I don't understand.</p> <p>10 Q. So, was Courtney always located</p> <p>11 in the Melville office?</p> <p>12 A. I believe so.</p> <p>13 Q. All right. At some point, it</p> <p>14 sounds like, if you started to -- reporting</p> <p>15 to her in 2018, something changed, right?</p> <p>16 Either she came to the office, or the</p> <p>17 structure changed, right?</p> <p>18 A. She came from a different</p> <p>19 department in Woodbury, yes.</p> <p>20 Q. Okay. Do you remember who your</p> <p>21 manager was before Bill Newport?</p> <p>22 A. I believe Mike DeGrocco.</p> <p>23 Q. To the best of your</p> <p>24 recollection -- and I realize it was a long</p> <p>25 time ago -- who was your supervisor in</p>
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<p>1 M. A. Fischer</p> <p>2 job, claims that had already been paid,</p> <p>3 right?</p> <p>4 A. Correct.</p> <p>5 Q. All right. Other</p> <p>6 investigators, like inside and outside</p> <p>7 investigators, are typically investigating</p> <p>8 pending claims, right?</p> <p>9 A. Yes.</p> <p>10 Q. How would cases get assigned to</p> <p>11 you as an inside medical investigator?</p> <p>12 A. The supervisor would assign</p> <p>13 them.</p> <p>14 Q. Who was your supervisor before</p> <p>15 you retired?</p> <p>16 A. Kristen Slack.</p> <p>17 Q. Do you remember who the manager</p> <p>18 was?</p> <p>19 A. Courtney Wolfe.</p> <p>20 Q. How long was Courtney Wolfe</p> <p>21 your manager?</p> <p>22 A. I believe -- my best estimate</p> <p>23 was that she started in 2018, I think.</p> <p>24 Q. Prior to Courtney Wolfe, who</p> <p>25 was your manager?</p>	<p>1 M. A. Fischer</p> <p>2 2016?</p> <p>3 A. 2016, I believe Danielle</p> <p>4 Perdomo.</p> <p>5 Q. And how long was she your</p> <p>6 supervisor for?</p> <p>7 A. I couldn't say exactly, but I</p> <p>8 would estimate around two years.</p> <p>9 Q. Who was your supervisor after</p> <p>10 that?</p> <p>11 A. Kristin Slack.</p> <p>12 Q. Was there anyone in the middle?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. Danielle had previously been my</p> <p>16 supervisor once before also. There was</p> <p>17 somebody before Danielle.</p> <p>18 Q. Okay. To the best of your</p> <p>19 recollection, was Mike DeGrocco your</p> <p>20 manager or the manager of the Woodbury</p> <p>21 office in 2016?</p> <p>22 A. No.</p> <p>23 Q. Who was?</p> <p>24 A. I don't believe he was. I</p> <p>25 believe it was Bill Newport. I'm not sure.</p>

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1 M. A. Fischer
2 A. I started doing medical -- I
3 was always doing medical investigations.
4 Q. Oh, okay.
5 A. Yes.
6 Q. Would you ever do, I guess,
7 some of the more traditional investigations
8 of individual claims or no?
9 A. No.
10 Q. No? So, from day one you were
11 doing medical investigations?
12 A. Yes.
13 Q. Okay. What did you do before
14 you started working at Geico? Like, did
15 you have a background in this sort of
16 investigative work?
17 A. I have a bachelor's degree in
18 criminal justice from St. John's
19 University.
20 Q. Okay.
21 A. I worked for Hertz Rent-a-Car
22 in the security administrative position. I
23 worked for another leasing company for a
24 few years doing billing. And then I was
25 home for a number of years with my

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1 M. A. Fischer
2 children.
3 Q. Got it. Okay.
4 I was just curious if you
5 had -- I know it sounds like there's a fair
6 amount of former law enforcement that work
7 in the special investigations unit.
8 A. Yes.
9 Q. Your husband included, right?
10 A. Yes, sir.
11 Q. Yeah. The third sentence here
12 says you worked from Geico's Woodbury, now
13 Melville, office in Nassau County,
14 New York, and in the field until about
15 March 2020 when you worked remotely in your
16 home, right?
17 A. Yes.
18 Q. Now, we talked a little bit
19 about how you would occasionally go out
20 into the field.
21 Does this refer to that?
22 A. In the beginning, we were out
23 in the field maybe once a week, more often;
24 and then as it changed -- the job changed
25 over the years how things were done.

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1 M. A. Fischer
2 Q. Got it. And then I think you
3 said it was right around that 2016 or 2017
4 time period where you sort of permanently
5 were working in the office?
6 A. I believe so in that -- it
7 seems that time period, yes.
8 Q. Okay. From this entire time,
9 January 2010 to November 2020, it sounds
10 like your formal job title may have
11 changed; is that right?
12 A. Yes.
13 Q. Did your job responsibilities
14 change?
15 A. Yes, in that we were not
16 required to go into the field as often.
17 Q. All right. Aside from not
18 having to go out into the field one day a
19 week, did your job responsibilities change
20 in any other way?
21 A. No.
22 Q. Okay. Did you ever work out
23 of -- well, strike that.
24 You're aware that there was
25 another office located in the State of New

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1 M. A. Fischer
2 York?
3 A. Yes.
4 Q. All right. And where was that?
5 A. Buffalo.
6 Q. All right. Did you ever work
7 out of the Buffalo office?
8 A. No.
9 Q. You seem very happy about that.
10 A. Yes.
11 Q. Why is that?
12 A. It's very cold in Buffalo.
13 It's a lot of snow. It was very far away.
14 Q. Did you ever interact with
15 investigators that worked out of the
16 Buffalo office?
17 A. No.
18 Q. Okay. Do you have
19 understanding of, like, what kind of work
20 the Buffalo office did, the SIU department
21 in the Buffalo office?
22 A. Not -- it's -- I would assume
23 it was the same that we did, but I'm not --
24 I'm not -- I don't know exactly what
25 they --

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1 M. A. Fischer

2 Q. Okay. Did you have a specific

3 geographic area for which you investigated

4 claims or cases?

5 A. Region 2 in New York.

6 Q. So, Woodbury is or was Region

7 2, right?

8 A. Right. Right.

9 Q. Were the actual claims or cases

10 that you were investigating located in the

11 State of New York?

12 A. And some in New Jersey.

13 Q. Okay. So, some of your cases

14 concerned, like, New Jersey medical

15 providers?

16 A. Yes.

17 Q. Okay. When you had field

18 investigations that needed to be done for

19 those New Jersey cases, who would get

20 assigned that work?

21 A. I only had a very few, and I

22 don't remember who did them. It would be

23 probably a field investigator from our

24 office.

25 Q. All right. I guess, do you

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1 M. A. Fischer

2 know if it was a field investigator out of

3 Woodbury or if it was a field investigator

4 assigned out of the Buffalo office?

5 A. No. It might have been out of

6 the New Jersey office.

7 Q. There was a separate New Jersey

8 office there?

9 A. There was also a region that

10 covered New Jersey. There was an office in

11 New Jersey.

12 Q. Okay.

13 A. Now that I think of it.

14 Q. Got it.

15 Did you interact with the

16 individuals that were located in New

17 Jersey?

18 A. Just if they did an

19 investigation for me.

20 Q. Okay. How big was this office

21 in New Jersey?

22 A. I do not know.

23 Q. Okay. Did you ever go there?

24 A. No.

25 Q. Okay. In paragraph 3, you say:

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1 M. A. Fischer

2 As a special investigator, my main job

3 duties were to investigate claims of

4 suspected medical fraud. Geico assigns

5 cases of suspected medical fraud to special

6 investigators who are responsible for

7 documenting evidence of fraud.

8 I'll pause there for a second.

9 You talked about some of the activities

10 that you would do to investigate it. Let's

11 talk about the actual documentation,

12 though.

13 Where would you document the

14 things that you were doing on cases?

15 A. In our online case file, which

16 was called SICM.

17 Q. All right. So, you would use

18 the SICM system to document your

19 activities?

20 A. My findings.

21 Q. Not your activities?

22 A. My activities would be noted in

23 the report, yes.

24 Q. I guess on a day-to-day basis,

25 right, if you're reviewing billing records

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1 M. A. Fischer

2 or things like that that you were talking

3 about, where would you document those?

4 A. In SICM, in the reflected case.

5 Q. Okay.

6 A. Yes.

7 Q. I guess, do you have an

8 understanding as to whether the way you

9 documented cases in SICM differed or was

10 the same than other investigators, either

11 field or desk?

12 MS. DSOUZA: Objection.

13 A. I am not aware of how other

14 investigators document.

15 BY MR. TSONIS:

16 Q. All right. Would you enter

17 your, I guess, activities sort of in a

18 separate line in SICM? Or did they all go

19 in the same entry and you would just update

20 it?

21 A. It would be in a note, a

22 separate note for each activity. There

23 could be many on one day, and there could

24 be one on a day.

25 Q. There could be none on a day?

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<p style="text-align: right;">Page 97</p> <p>1 M. A. Fischer</p> <p>2 saved on -- some initial steps you take</p> <p>3 with every case?</p> <p>4 A. Yes.</p> <p>5 Q. All right. And then after</p> <p>6 that, is it accurate to say that it kind of</p> <p>7 depends on where the investigation takes</p> <p>8 you?</p> <p>9 A. Yes. And the supervisor can</p> <p>10 also direct you, you know, you need to do</p> <p>11 this; this needs to get done by the next</p> <p>12 15 days, certain things that come up if</p> <p>13 they find something.</p> <p>14 Q. Okay. If you were doing an</p> <p>15 investigative activity and 15 days later</p> <p>16 you were still working on it, could you</p> <p>17 satisfy that requirement by simply going</p> <p>18 into SICM and saying still investigating</p> <p>19 whatever that issue was?</p> <p>20 A. No.</p> <p>21 Q. Why not?</p> <p>22 A. Because you have to show a</p> <p>23 substantial activity on that case to keep</p> <p>24 that case moving. You can't just have a</p> <p>25 case sit.</p>	<p style="text-align: right;">Page 99</p> <p>1 M. A. Fischer</p> <p>2 Q. For the purposes of their</p> <p>3 performance review?</p> <p>4 A. Yes.</p> <p>5 Q. And what are those metrics?</p> <p>6 A. They are audits, the -- our</p> <p>7 cases were audited by other supervisors,</p> <p>8 how -- your timeline and your cases, your</p> <p>9 diary, if everything was up to date, you</p> <p>10 know, your performance, if, you know, you</p> <p>11 were there, you weren't there, things like</p> <p>12 that.</p> <p>13 Q. All right. Is the audit metric</p> <p>14 that you're referring to what Geico calls</p> <p>15 quality?</p> <p>16 A. I'm sorry?</p> <p>17 Q. Is the -- is the metric that</p> <p>18 you're referring to regarding having to do</p> <p>19 documentation correctly, what Geico refers</p> <p>20 to as a quality metric?</p> <p>21 A. I'm not sure. I've never heard</p> <p>22 that, I don't think.</p> <p>23 Q. Okay. But you referenced</p> <p>24 audits being done by other supervisors of</p> <p>25 your files?</p>
<p style="text-align: right;">Page 98</p> <p>1 M. A. Fischer</p> <p>2 Q. Right. But if, I guess, the</p> <p>3 substantial activity that you're working</p> <p>4 on, you know, wasn't completed in 15 days,</p> <p>5 what would happen?</p> <p>6 A. You would write what you had</p> <p>7 completed.</p> <p>8 Q. Okay. Prior to COVID, how many</p> <p>9 new cases were you assigned typically in a</p> <p>10 month?</p> <p>11 A. Well, we said four.</p> <p>12 Q. Okay. So, you would have four</p> <p>13 cases that you were assigned. I think you</p> <p>14 said it would take sometimes months to</p> <p>15 close cases.</p> <p>16 A. Yeah.</p> <p>17 Q. How many cases would you</p> <p>18 typically close in a given month?</p> <p>19 A. Every month would be different.</p> <p>20 I would say on average, maybe three.</p> <p>21 Q. Okay. You were a Geico</p> <p>22 associate for a long time. I'm sure you</p> <p>23 know that there are certain metrics against</p> <p>24 which associates are rated, right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 100</p> <p>1 M. A. Fischer</p> <p>2 A. Yes.</p> <p>3 Q. All right. And they assessed</p> <p>4 your files for, essentially, you know,</p> <p>5 doing the activities and documenting them</p> <p>6 the right way?</p> <p>7 A. Correct.</p> <p>8 Q. All right. Besides that sort</p> <p>9 of, you know, metric, did you have other</p> <p>10 specific metrics that you were held to?</p> <p>11 A. (No verbal response.)</p> <p>12 Q. For example, your performance</p> <p>13 wasn't assessed against the number of days</p> <p>14 it took to close a case, right?</p> <p>15 A. Not on our cases.</p> <p>16 Q. Not on major case?</p> <p>17 A. No.</p> <p>18 Q. Or inside medical?</p> <p>19 A. Right.</p> <p>20 Q. All right. And similarly, you</p> <p>21 weren't rated in terms of productivity on</p> <p>22 how many cases you closed per month?</p> <p>23 A. No.</p> <p>24 Q. No, that's not right? Or, no,</p> <p>25 you weren't?</p>

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<p>1 M. A. Fischer</p> <p>2 A. No, we weren't.</p> <p>3 Q. Okay. Do you have an</p> <p>4 understanding as to whether field or desk</p> <p>5 investigators are assessed in how many</p> <p>6 cases they close per month?</p> <p>7 MS. DSOUZA: Objection.</p> <p>8 A. I do.</p> <p>9 Q. All right. And is your</p> <p>10 understanding that that was a performance</p> <p>11 metric that applied to them?</p> <p>12 A. Yes.</p> <p>13 Q. All right. Similarly, do you</p> <p>14 have an understanding as to whether field</p> <p>15 and desk investigators had a metric called</p> <p>16 time to close that they were assessed with?</p> <p>17 A. No.</p> <p>18 Q. You have no understanding that</p> <p>19 field or desk investigators, in part, had a</p> <p>20 metric monthly as to how many days their</p> <p>21 cases were open?</p> <p>22 A. Yes.</p> <p>23 Q. All right. You understood</p> <p>24 that, for those investigators, you received</p> <p>25 a better score if your cases were open less</p>	<p>1 M. A. Fischer</p> <p>2 A. Not personally.</p> <p>3 Q. Got it. Because you didn't</p> <p>4 receive a three, you got fours or fives?</p> <p>5 A. Well, I worked hard.</p> <p>6 Q. All right. Well, you</p> <p>7 understand that a four or five rating is</p> <p>8 above average or a very good rating at</p> <p>9 Geico, right?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And an associate</p> <p>12 that receives a rating of a two or a one is</p> <p>13 someone that isn't meeting expectations?</p> <p>14 A. Is what?</p> <p>15 I'm sorry.</p> <p>16 Q. Someone that isn't meeting</p> <p>17 expectations?</p> <p>18 A. Yes.</p> <p>19 Q. All right. Did you ever</p> <p>20 receive a one or a two?</p> <p>21 A. No.</p> <p>22 Q. Okay. Did the ratings --</p> <p>23 strike that.</p> <p>24 Aside from quality, do you</p> <p>25 recall any other metrics that were involved</p>
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<p>1 M. A. Fischer</p> <p>2 time and a worse score if your cases were</p> <p>3 open for a significant amount of time?</p> <p>4 A. Yes.</p> <p>5 Q. All right. And -- but that</p> <p>6 worked differently, we said, for inside</p> <p>7 medical, like yourself, investigators?</p> <p>8 A. Correct.</p> <p>9 Q. Would you receive performance</p> <p>10 ratings each year?</p> <p>11 A. Yes.</p> <p>12 Q. All right. Do you have a</p> <p>13 general sense of where you shook out in</p> <p>14 terms of your performance on a year-to-year</p> <p>15 basis?</p> <p>16 A. I was always in the top four or</p> <p>17 five percent.</p> <p>18 Q. Okay. And just for clarity,</p> <p>19 I'm sure you recall. Do you have -- do you</p> <p>20 understand that Geico rates all its</p> <p>21 associates from a yearly review standpoint</p> <p>22 on a one-to-five scale?</p> <p>23 A. Yes.</p> <p>24 Q. Do you agree that three, using</p> <p>25 Geico's scale, is satisfactory?</p>	<p>1 M. A. Fischer</p> <p>2 in your performance reviews?</p> <p>3 A. Not that I can recall. It's</p> <p>4 been a while.</p> <p>5 Q. Besides SICM what other</p> <p>6 systems, Geico systems, did you use on a</p> <p>7 regular basis?</p> <p>8 A. Outlook for e-mail. Workday</p> <p>9 for time management. I had access to</p> <p>10 billing.</p> <p>11 Q. When you say "billing," is that</p> <p>12 the Atlas database?</p> <p>13 A. Yes. And we had Background.</p> <p>14 We had a background services that we ran.</p> <p>15 Q. That's fair.</p> <p>16 So, there was a number of, I</p> <p>17 guess, third-party providers, we'll call</p> <p>18 them, that you could run different checks</p> <p>19 on, right?</p> <p>20 A. Yes.</p> <p>21 Q. All right. And you had</p> <p>22 credentials and access and would use those</p> <p>23 kinds of systems?</p> <p>24 A. Yes.</p> <p>25 Q. All right. Did you have a</p>

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<p>1 M. A. Fischer</p> <p>2 E X H I B I T S</p> <p>3</p> <p>4 DEFENDANT EXHIBITS</p> <p>5</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">EXHIBIT</td> <td style="width: 70%;">EXHIBIT</td> <td style="width: 20%;">PAGE</td> </tr> <tr> <td>NUMBER</td> <td>DESCRIPTION</td> <td></td> </tr> <tr> <td>8 1</td> <td>interrogatories</td> <td>79</td> </tr> <tr> <td>9 2</td> <td>Workday profile</td> <td>153</td> </tr> <tr> <td>10 3</td> <td>human resources</td> <td>167</td> </tr> <tr> <td>11</td> <td>associate handbook</td> <td></td> </tr> <tr> <td>12 4</td> <td>Excel spreadsheet</td> <td>200</td> </tr> <tr> <td>13 5</td> <td>2017 self-appraisal</td> <td>213</td> </tr> <tr> <td>14 6</td> <td>Excel spreadsheet</td> <td>227</td> </tr> <tr> <td>15 7</td> <td>the operative complaint</td> <td>233</td> </tr> <tr> <td>16 8</td> <td>interrogatories</td> <td>258</td> </tr> <tr> <td>17 9</td> <td>e-mail chain</td> <td>270</td> </tr> <tr> <td>18</td> <td></td> <td></td> </tr> <tr> <td>19</td> <td></td> <td></td> </tr> <tr> <td>20</td> <td colspan="2">(*Exhibits attached to transcript.)</td> </tr> <tr> <td>21</td> <td></td> <td></td> </tr> <tr> <td>22</td> <td colspan="2">(Cont'd next page.)</td> </tr> <tr> <td>23</td> <td></td> <td></td> </tr> <tr> <td>24</td> <td></td> <td></td> </tr> <tr> <td>25</td> <td></td> <td></td> </tr> </table>	EXHIBIT	EXHIBIT	PAGE	NUMBER	DESCRIPTION		8 1	interrogatories	79	9 2	Workday profile	153	10 3	human resources	167	11	associate handbook		12 4	Excel spreadsheet	200	13 5	2017 self-appraisal	213	14 6	Excel spreadsheet	227	15 7	the operative complaint	233	16 8	interrogatories	258	17 9	e-mail chain	270	18			19			20	(*Exhibits attached to transcript.)		21			22	(Cont'd next page.)		23			24			25		
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 1 M. A. Fischer 2 C E R T I F I C A T E 3 4 STATE OF NEW YORK) 5 : COUNTY OF RICHMOND) 6 7 I, MARINA DUBSON, a Notary Public for 8 and within the STATE OF NEW YORK, do hereby 9 certify: 10 That the witness whose examination is 11 hereinbefore set forth was duly sworn and 12 that such examination is a true record of 13 the testimony given by that witness. 14 I further certify that I am not 15 related to any of the parties to this 16 action by blood or by marriage and that I 17 am in no way interested in the outcome of 18 this matter. 19 IN WITNESS WHEREOF, I have hereunto 20 set my hand this 19th day of December 2024. 21 22 Marina Dubson 23 MARINA DUBSON 24 25 || 1 M. A. Fischer 2 I N D E X 3 | | | |--|--------| | EXAMINATION BY | PAGE | | 5 MR. TSONIS | 7, 287 | | 6 MS. DSOUZA | 282 | | 7 | | | 8 | | | 9 INFORMATION AND/OR DOCUMENTS REQUESTED | | | 10 INFORMATION AND/OR DOCUMENTS | PAGE | | 11 BY MR. TSONIS: | | | 12 1. Request to preserve notes | 42 | | 13 2. Request for notes | 43 | | 14 BY MS. DSOUZA: | | | 15 3. Request for e-mails | 292 | | 16 4. Request for swipe card activity | 293 | | 17 as well as SICM data | | | 18 5. Request for yearly goals | 293 | | 19 | | | 20 | | | 21 QUESTIONS MARKED FOR RULINGS | | | 22 PAGE LINE QUESTION | | | 23 (None) | | | 24 | | | 25 | | | 1 ERRATA SHEET 2 WITNESS NAME: MARGARET. A FISCHER | PAGE | LINE (s) | CHANGE | REASON | |------|----------|--------|--------| | 4 | | | | | 5 | | | | | 6 | | | | | 7 | | | | | 8 | | | | | 9 | | | | | 10 | | | | | 11 | | | | | 12 | | | | | 13 | | | | | 14 | | | | | 15 | | | | | 16 | | | | | 17 | | | | | 18 | | | | | 19 | | | | | 20 | | | | | 21 | | | | | 22 | | | | | 23 | | | | | 24 | | | | | 25 | | | | ----- MARGARET. A FISCHER SUBSCRIBED AND SWORN BEFORE ME THIS ____ DAY OF _____, 20__. (NOTARY PUBLIC) MY COMMISSION EXPIRES: |